

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Case Number: 11mj459

AJB

(01) LAWRENCE DEANGELO WILLIAMSON
(02) BOYD JEROME MORSON, II

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 10-26-2011 in Hennepin county, in the State and District of Minnesota defendants, LAWRENCE DEANGELO WILLIAMSON and BOYD JEROME MORSON, II, each aiding and abetting the other, did knowingly, by force, violence, and intimidation, take from the person and presence of a victim teller approximately \$13,500 in United States currency belonging to and in the care, custody, control, management, and possession of the First Minnesota Bank located in Champlin, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a handgun, all

in violation of Title 18 United States Code, Sections 2113(a) and 2113(d).

I further state that I am a Special Agent and that this complaint is based on the following

facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

The Honorable Arthur J. Boylan
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Complainant

Michael Ferrick
FBI

at

Minneapolis, MN
City and State

Signature of Judicial Officer

SCANNED

NOV - 4 2011

U.S. DISTRICT COURT MPLS

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF Michael G Ferrick
COUNTY OF HENNEPIN)

I, Michael G Ferrick, being first duly sworn under oath, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation. I am a member of the Violent Crimes and Major Offender Squad, with duties that include investigating bank robberies.

2. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and upon my review of official reports submitted in relation to this investigation.

3. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and therefore contains only a summary of relevant facts.

4. On October 26, 2011, at approximately 10:00 A.M., the First Minnesota Bank located at 11431 Jefferson Court North, Champlin, Minnesota 55316, was robbed by two black males wearing hoods and masks. The victims were able to determine the subjects' race based on the skin visible through the masks. The robbers entered bank and one robber vaulted the counter while the second robber went to the vice president's office. The robber who vaulted the teller counter subdued the victim teller at gun point. The second robber who

proceeded to the vice president's office commanded the vice president to accompany the robber back to the safe. On his way to the safe the robber demanded that the third employee of the bank also accompany him to the safe, where the other robber and the teller already were. When the two robbers and three bank employees were all in the area of the safe one of the robbers produced a black backpack and demanded that the employees fill it with money, while emphatically emphasizing that the employees were not to place any "funny money" into the backpack. Before fleeing the bank the robbers demanded that the employees lie down on the floor.

5. An audit conducted by the bank revealed that the robbers stole approximately \$13,700.00, in the following denominations: \$100s, \$50s, \$20, \$5 and \$1. The robbers also took a cash counting machine. The bank employees provided descriptions of the robbers to law enforcement. The robber who entered the vice president's office was described as a black male, approximately 5'5" to 5'6", thin build, early 20s, with somewhat Asian characteristics to his eyes. He was described as wearing a dark hooded sweatshirt, dark baggy jeans, and a dark mask. The subject utilizing the handgun was described as a black male, extremely thin build, 5'4" to 5'5", and approximately 18 to 25 years old. He was further described as wearing a red bandana, dark hooded sweatshirt, and dark baggy jeans.

6. One of the bank employees described seeing a dark truck, possibly a Chevy, in the parking lot of the bank. Shortly after the robbery occurred Brooklyn Park Police and Fire responded to a vehicle fire in the area of 107th and Unity Avenue in Brooklyn Park. The vehicle was identified as a dark blue Chevy Tahoe. This vehicle matched the description of the vehicle seen at the bank robbery. Additionally, a witness who lived in the area observed the now burned vehicle driving at a high rate of speed past her home approximately four times and each time it was being trailed by a Cadillac. After the fourth time the vehicles drove past the witness' house, the witness heard an explosion, and then observed the Cadillac leaving the area.

7. Based on information from a similar robbery, which had occurred on April 14, 2011, at an Anchor Bank in Plymouth, Minnesota, police were dispatched to the residence of Boyd MORSON II. In that robbery the suspects also used a Tahoe which was subsequently set on fire. MORSON had been identified as a suspect in the April 14th robbery and was known to drive a Cadillac. Additionally, MORSON resided at 10701 Perry Drive North, Brooklyn Park, Minnesota, which is a short distance from where the dark blue Tahoe was burned. The other subject identified in the April 14th robbery, Lawrence WILLIAMSON, had an address of 10742 Unity Lane North, Brooklyn Park,

Minnesota, which was in the same area in which the Tahoe from the October 26th robbery was burned.

8. Also on October 26, 2011, law enforcement established surveillance of 10701 Perry Drive North, Brooklyn Park and saw a Cadillac which a witness stated matched the vehicle observed departing the scene where the dark blue Tahoe had been set on fire. Law enforcement observed two females and two males exit the house carrying bags which they placed in the trunk of a red Toyota. The males matched the description of the robbers. The males got into the rear passenger seats and the females were in the front passenger seat and driver's seat respectively. After following the vehicle to Brooklyn Park, a traffic stop was initiated and the two males were identified as Lawrence WILLIAMSON and Boyd MORSON. Located in the trunk of the vehicle was a black backpack which matched the backpack utilized in the robbery. The vehicle was later searched and it was found that the backpack contained a Beretta 9MM handgun, two license plates removed from the burned Tahoe, and a piece of the cash counting machine removed from the First Minnesota Bank.

9. Also, on October 26, 2011, a search was conducted of the residence at 10701 Perry Drive North, Brooklyn Park. A search was also conducted on the Cadillac that was parked at that address. The Cadillac was registered to MORSON. Approximately \$9,000 in cash was located in a drawer in the bathroom adjacent to MORSON'S room.

Additionally, several masks, gloves and a dark hooded sweatshirt, which match the clothing utilized in the robbery, were seized at the house.

10. On October 26, 2011, an interview was conducted with MORSON at the Champlain Police Department, 11955 Champlin Drive, Champlin, Minnesota 55316. Prior to the interview MORSON was advised of his Miranda rights, and agreed to speak with law enforcement. MORSON advised that he had robbed the First Minnesota Bank in Champlin earlier in the day. MORSON stated that he acted alone and that he was the individual who entered the vice president's office and forced the other male employee to walk to the area of the bank in which the safe was located. He stated that he helped light the Tahoe on fire and that the black backpack located in the back of the red Tahoe belongs to WILLIAMSON. When permitted to make a phone call to his mother, MORSON advised her that he had robbed a bank.

11. On October 27, WILLIAMSON was interviewed at the Hennepin County Jail in Minneapolis, Minnesota. Prior to the interview WILLIAMSON was allowed to speak with his juvenile probation officer, Mark Joseph, and was advised of his Miranda rights. After being advised of his Miranda rights, he agreed to speak with law enforcement. WILLIAMSON admitted that he had robbed the First Minnesota Bank in Champlin on October 26, 2011. He had robbed the bank with MORSON, and he had carried a loaded Beretta 9MM while

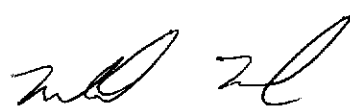
committing the robbery. WILLIAMSON said the gun is located inside the black backpack, along with the license plates of the burned Tahoe, and a piece of the cash counting machine he had taken from the bank. WILLIAMSON told law enforcement that he placed the backpack in the red Toyota in which he was traveling when stopped by law enforcement. WILLIAMSON stated that they had chosen the location for burning the Tahoe based on his knowledge of the area from having previously lived there, and that the Tahoe belonged to his brother, Elvie Williamson.

12. The deposits at the First Minnesota Bank located at 11431 Jefferson Court North, Champlin, Minnesota 55316, were federally insured by the Federal Deposit Insurance Corporation at the time of the robbery.

13. Based upon these facts there is probable cause to believe that BOYD MORSON II and LAWRENCE WILLIAMSON committed armed bank robbery on October 26, 2011, at the First Minnesota Bank located at 11431 Jefferson Court North, Champlin, Minnesota 55316, all in

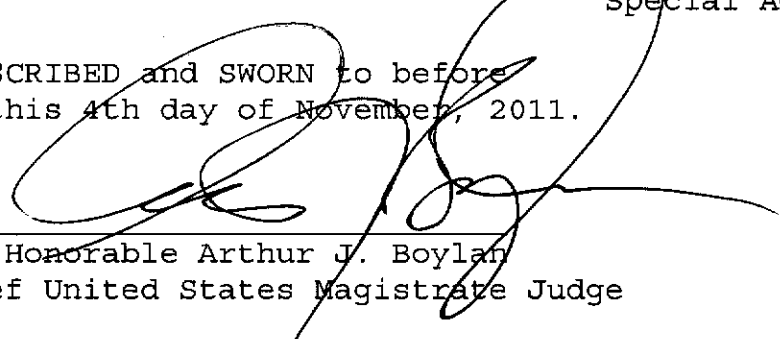
violation of Title 18, United States Code, Section 2113(a) and 2113(d).

Further your Affiant sayeth not.



Michael G. Ferrick
Special Agent

SUBSCRIBED and SWORN to before
me this 4th day of November, 2011.



The Honorable Arthur J. Boylan
Chief United States Magistrate Judge